

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Moody Landfill Fire - Removal Polrep
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #1
Initial POLREP - Emergency Response
Moody Landfill Fire
C4Q6
Moody, AL
Latitude: 33.6187920 Longitude: -86.5295290

To: James Webster, USEPA R4 ERRPPB
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From: Terry Stilman, FOSC

Date: 1/19/2023

Reporting Period: 1/17/2023 - 01/19/2023

1. Introduction

1.1 Background

Site Number:	C4Q6	Contract Number:	
D.O. Number:		Action Memo Date:	1/18/2023
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/18/2023	Start Date:	1/18/2023
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response to a Landfill Fire

1.1.2 Site Description

The Alabama Department of Environmental Management (ADEM) considers the Site as a disposal area for vegetative debris (aka "green waste") with several piles of material in various states of management. The U.S. Environmental Protection Agency (EPA) and ADEM have documented the presence of construction debris within the landfill and as indicated by signs at the Site, the landfill also accepted asphalt waste. The Site was not constructed with a landfill liner or drainage controls. Layers of cover material have not consistently been installed as part of the Site operations and maintenance practices.

1.1.2.1 Location

The Site is surrounded by residential homes in all directions; a forest is located to the east. The Site drains north to an unnamed tributary and then 2,500 feet east to Big Black Creek.

1.1.2.2 Description of Threat

On January 4, 2023, ADEM requested assistance from the EPA to conduct air monitoring and air sampling at the Site. The fire at Moody Landfill has been burning since late November 2022. Residents near the fire have filed multiple complaints with the State and St. Clair County as well as with the National Response Center (NRC) regarding the smoke and potential health hazards.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On January 6, 2023, the EPA mobilized to the Site with equipment and personnel to conduct air monitoring and collect air samples at four stations in and around the Site. Two stations were located on the landfill property, and two were established in residential lots less than 200 yards downwind of the Site. At each station the EPA deployed the following equipment:

- Air monitoring equipment:
RAE (Honeywell) AreaRAE Pro for measurement of toxic gases
Honeywell Single Point Monitor (SPM) for measurement of acid gas
TSI DustTrak for measurement of particulates
- Air sampling equipment:
SUMMA Canister for analysis of Volatile Organic Compounds (VOCs)
Sensidyne Gilian AirCon-2 with media filter for analysis of SemiVolatile Organic Compounds (SVOCs)
Sensidyne Gilian BDX-II with media filter for analysis of asbestos

Sampling and monitoring activities were completed on January 7, 2023, and the EPA demobilized from the Site to await analytical results. Air samples were sent off-site for laboratory analysis. Results of analysis of the air samples indicated that four VOCs (1,3-Butadiene, Acetonitrile, Benzene and Trichloroethene)

exceeded their respective EPA residential Removal Management Levels (RMLs) at the onsite sampling stations. Two VOCs (1,3-Butadiene and Benzene) exceeded their respective RMLs at a sampling station on a residential lot.

ADEM and St. Clair County have inspected the Site, conducted air monitoring, and implemented public outreach efforts. Local firefighting resources have responded with attempts to extinguish the fire that have been unsuccessful. In November of 2022, Alabama Forestry Commission cut a fire break around the perimeter of the Site to reduce the risk of ignition in adjacent parcels. Representatives from State and Local agencies have attempted to work with the owner and operator of the landfill facility to compel firefighting efforts that have not been successful. St. Claire County and the State of Alabama declared states of emergency on January 3 and 18, 2023, respectively. On January 17, 2023, ADEM and St. Clair County requested EPA assistance to address the continued off-site migration of hazardous substances.

On January 18, 2023, the EPA Federal On-Scene Coordinator (FOSC) determined that an emergency response removal action was warranted based on these sample results.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The EPA is coordinating a mobilization of resources from its Emergency Rapid Response Services (ERRS) contractor, Superfund Technical Assessment and Response Team (START) contractor and the EPA Environmental Response Team (ERT). The EPA is also coordinating with ADEM and St. Clair County to identify a source that can be used as cover material to assist with fire mitigation activities.

Anticipated actions include:

- Establishing an air monitoring / air sampling network around the Site and in the adjacent neighborhood to determine impacts from the fire,
- Provide air monitoring and air sampling data to affected residents and local officials.
- Mobilizing heavy equipment and other resources to begin firefighting efforts.

2.1.2 Response Actions to Date

EPA and EPA-contractor personnel and equipment started to arrive on January 19, 2023.

During this operational period (1/19/23):

Locations for four Air sampling and Air monitoring stations were selected. ERT Air Monitoring equipment was deployed to three of those stations.

ERRS heavy equipment arrived on-site. Firefighting operation began, with movement of smoldering piles of soil and debris.

Operations will continue during daylight hours.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA will continue to identify PRPs for the Site.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Fire mitigation activities will continue with additional movement of smoldering piles, compaction of the landfill and smothering the fire with additional borrow material.

2.2.1.1 Planned Response Activities

Additional personnel and equipment will arrive over the coming days.

2.2.1.2 Next Steps

ADEM and St. Claire County is assisting EPA with location of borrow material for fire mitigation activities.

2.2.2 Issues

None identified.

2.3 Logistics Section

ERRS continues to receive heavy equipment and supplies.

2.4 Finance Section

2.4.1 Narrative

An Emergency Response Action Memo has been issued.

Estimated Costs *

		Total To		%
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	Budgeted	Date	Remaining	Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$100,000.00	\$10,000.00	\$90,000.00	90.00%
TAT/START	\$50,000.00	\$5,000.00	\$45,000.00	90.00%
EPA RRC	\$20,000.00	\$5,000.00	\$15,000.00	75.00%
REAC	\$80,000.00	\$5,000.00	\$75,000.00	93.75%
Intramural Costs				
Total Site Costs	\$250,000.00	\$25,000.00	\$225,000.00	90.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA ERT is assisting with Site Safety.

2.5.2 Community Liaison Officer

EPA has identified a Community Involvement Coordinator for the Site.

2.5.3 Information Officer

EPA has identified a Public Information Officer for the Site.

3. Participating Entities

Unified Command

EPA
ADEM
St. Claire County

4. Personnel On Site

EPA - 4
ERT - 3
START - 2
ADEM - 2
St. Claire County - 2
ERRS - 10

5. Definition of Terms

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6. Additional sources of information

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7. Situational Reference Materials

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